



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Comment Sought on Measures) CG Docket No. 09-158
Designed to Assist U.S. Wireless)
Consumers to Avoid "Bill Shock")

Reply of Princeton Survey Research Associates International
To Verizon Wireless
September 3, 2010

Verizon Wireless submitted comments to the Federal Communications Commission (FCC) dated July 19, 2010, concerning the Commission's Public Notice seeking to gather information on the feasibility of instituting usage alerts and other mechanisms to inform cell phone users about rising usage charges, sometimes called *Bill Shock*.

In those comments, Verizon Wireless attacks and disparages a survey of American adults conducted for the FCC by Abt/SRBI and Princeton Survey Research Associates International (PSRAI).

The survey for the FCC was designed and conducted in line with the best practices of telephone survey research in America today. The complete survey results, questionnaire, methodology and the survey data itself have been fully disclosed and are available online.

The attacks by Verizon are wrong, misleading, and unsupported by the analysis Verizon sought out in its search to justify its position.

The attacks

The Verizon comments to the FCC were made in two parts:

- 1) The *Reply Comments* signed by two Verizon Wireless lawyers.
- 2) An analysis of the survey results by Dr. Joel B. Cohen, a professor emeritus at the University of Florida.

First, we will focus on the *Reply Comments*. The Verizon lawyers open with:

“Advocates for new rules mandating specific usage tools do not provide facts that could justify new regulation. While they point to a recent survey conducted for the Commission, the survey is marred by numerous problems that undermine its validity.”

-- *Reply Comments, Page 1*

Then in summary, the lawyers pen these words:

“The survey has numerous flaws as to methodology, making its results inaccurate and unreliable, and precluding its use as the basis to consider new rules.”

-- *Reply Comments, Page 9*

The Verizon employees who signed the *Reply Comments* do not represent themselves as experts on survey methodology, questionnaire construction or analysis of interview data. Thus, their conclusions should be solidly based on the Cohen Report. This is not the case.

Despite the *Reply Comments'* repeated references to the survey's methodology, the Cohen report does not analyze or comment upon the major elements of the survey's methodology. The Cohen report does not mention:

- Sample design
- Call design and sample execution
- Sample dispositions
- Weighting

Therefore, there is no dispute that the survey interviewed an appropriate sample of the American public; that appropriate efforts were made to reach those who were in the sample; that the survey data was processed correctly; and that the data was weighted to the appropriate parameters.

The Cohen Report

Turning now to the Cohen Report itself, here is the Verizon lawyers' summary of the analysis:

“Given these methodological and other problems with the survey, it does not supply a valid factual basis for drawing conclusions about wireless customers' experiences...”

-- *Reply Comments, Page 8*

These lawyers' comment seems to be an attack on the representativeness of the survey sample. This is an unsupported criticism, since, as noted above, no such issue is raised in the Cohen Report, which does not criticize the poll's basic methodology.

The Cohen Report's critiques are limited to two areas:

- The wording of some questions and several structural choices in the questionnaire, and
- Analytical conclusions based on the survey.

Questionnaire structure and question wording are critically important in every survey. PSRAI does not take lightly Dr. Cohen's comments and criticisms. Dr. Cohen's curriculum vitae shows he has studied and worked in the field of survey research.

Questionnaire design and question wordings, however, are not simply the mechanistic applications of hard-and-fast rules. Despite thousands of academic studies and many excellent books on question design, there is ample disagreement among experts about the proper question wording for given situations. There is both art and science in designing questions.

In contrast, analytical conclusions from a survey are an area that is often a question of subjective judgments, in addition to the careful application of science.

Dr. Cohen's criticisms are generally reasoned and supported by his views of survey research. However, his views of survey research are one expert's views: judgments, not facts. At times, Dr. Cohen's analysis is based solely on a reading of the questionnaire, without any apparent effort to analyze the survey data to test his views and hypotheses. In addition, some of his critiques could have been answered with a phone call or an email to the researchers on the survey. No such communications were received.

Taking Dr. Cohen's report in order, here are PSRAI's responses:

Consumers did not report Bill Shock, page 3

This criticism is essentially an argument about analytical conclusions and the term *Bill Shock*. That term was not used in the survey. This was a specific design decision, based on seeing no evidence that the term was widely used among adults (while it did seem to be a term-of-art in the telecommunications field). The question asked was about a cell phone bill increasing "suddenly". Dr. Cohen argues that *Bill Shock* implies more than a sudden increase. That is a reasonable analytical opinion, but it simply his opinion.

Size of the sudden increase, pages 3-4

Dr. Cohen argues that reading respondents a list of dollar amounts of the size of the bill increase could have biased the results. That is a perfectly reasonable view and criticism. However, this question design is also perfectly reasonable, as he implicitly admits. He writes, "many survey researchers prefer to leave such a question open-ended" and his

conclusion is that he would have asked the question in an open-ended fashion. That does not mean choosing a different question design is in any way incorrect.

Inconsistency in question design, pages 4-5

After admitting that open-ended questions are preferable in some cases, Dr. Cohen reverses field and criticizes the survey for using a mix of open-ended and closed-ended questions. He calls this *inconsistency*. Some survey researchers adhere to a rigid set of question designs, with all questions and all answer categories in design lock-step. Other researchers, including those involved in this project, conclude that each question must be tailored to achieve the most accurate and well-formed response from the respondents and avoid the drumbeat of similar question after similar question, which can lead to various issues with respondent fatigue and response set.

For example, Dr. Cohen questions the use of one open-ended question, Q10. If he had considered it necessary to gather facts for his analysis, he could have asked the researchers and determined that Q10 is asked as an open-ended question based on years of research on individuals' knowledge of internet speed.

Leaving it up to Interviewers, page 5

Dr. Cohen's criticism of Question 60 is simply one of misunderstanding. While Dr. Cohen reads the interviewer instructions one way, the interviewers are in fact trained to read the question and accept an unaided answer. Only if the respondent had trouble with the question would the response categories be read. This is a standard prompting technique in interviewing.

Inconsistent Approach to Eligibility, pages 6-10

The survey significantly departs from well-established survey practices in a number of ways. Most important, standard survey practices ensure participants are only asked questions for which they have sufficient knowledge to respond.

....

First, adequate eligibility restrictions are not used throughout the survey, and the FCC approach is both flawed and inconsistent.

Cohen Report, page 6

These are Dr. Cohen's opinions, not statements of fact. The determinations of which respondents were asked which questions in this survey are based on well-considered judgments and careful design. Again, had Dr. Cohen taken the time to do so, the researchers responsible for the survey would have been happy to discuss the reasons for each choice in the skip patterns for the questions. No such request was received from Dr. Cohen.

Perhaps more importantly, there is no indication Dr. Cohen did any analysis of the

actual survey data, despite his statement to the contrary.

Verizon Wireless asked me to review the survey data made available by the FCC to determine whether the data adequately supported the agency's claims and conclusions.

Cohen Report, page 2

Instead, he appears to have simply read the topline (that is, the full questionnaire with the survey results filled in), from which he quotes. Had he taken the time to analyze the survey data itself (which is available online), he would have been able to resolve most or all of the issues he raises about eligibility. Most of his critiques are that people who didn't have "sufficient knowledge" about a given topic (according to Dr. Cohen) were asked questions related to that topic. Thus, he argues those who don't know about a topic either guess, or give flawed answers.

For most of the questions he criticizes, Dr. Cohen could have analyzed the actual data for the smaller group of respondents whom he claimed was appropriate for the question. Then he could have determined whether his speculations had a basis in fact.

For example, his critique of Q47 about cellular telephone bills is easily testable using the survey data. Here are the results of Q47a based only on those who pay their cell phone bills versus the numbers reported by the FCC:

Q47. Now I would like to ask you specifically about the bills you receive for your cell phone service. How clear is how much you are paying for cell phone service on your bill? Is this information very clear, somewhat clear, not too clear or not at all clear on your cell phone bills?		
	As Reported	Based only on those who actually pay cell phone bills
Very clear	71%	73%
Somewhat clear	16%	14%
Not too clear	3%	2%
Not at all clear	1%	1%
Not on the bill	1%	1%
No monthly bill	6%	7%
Don't know	2%	2%
Refused	* ¹	*

There is no statistically significant difference and no substantively significant difference between these results. Dr. Cohen sees the design as flawed. But he did not do any analysis to support his opinions. Such an analysis would have rebutted his assumption.

¹ Less than .5%.

The design is solid. Even following Dr. Cohen's admonitions would not have changed the results in a substantive way.

Approach to ETF is Flawed, pages 10-14

These portions of the analysis largely repeat the critiques of the earlier questions, just focused on a different set of questions from the survey. There is a statement that Dr. Cohen refers to several times in this section and in his conclusion which is simply his opinion, not fact.

"It is fundamental survey research procedure to allow people to say that they have no opinion about an area of inquiry rather than lead people to think they should have an opinion or know something they do not know. In the FCC survey researchers did not inform participants that it is fine to say they don't know or have no opinion about any subject they are asked about. When such answers actually appeared on the questionnaire, researchers were instructed NOT to read those options to respondents. The survey data therefore is likely to be contaminated by guesses."

Cohen Report, pages 2-3

All respondents to the survey were allowed to say they do not know the answer to a question or to refuse to answer the question. As Dr. Cohen notes, those options are always available in the survey.

It is not accepted, standard practice to provide an explicit encouragement for don't know or no opinion responses early in a survey. There are, however, institutions that sponsor surveys that require such encouragement. And Dr. Cohen aligns himself with that view.

"In my opinion"

Dr. Cohen is completely right to hold his views and opinions and to voice them strongly when he sees fit. As he states repeatedly, his report is "in my opinion" or "in my view".

Experienced, well-meaning researchers can and do agree on many aspects of survey methodology. And experienced, well-meaning researchers can and do disagree on specifics about questionnaire design, question wording and other matters.

Such disagreements are not indications of error: they are differences of opinion among professionals.

Conclusion

The Verizon lawyers' attack on the survey cites surveys showing cell phone customers are satisfied with their service.

"Moreover, other third-party surveys have shown that most customers are satisfied with their wireless service and that consumer satisfaction is increasing."

-- Reply Comments, Page 8

Perhaps the lawyers did not read the FCC survey results themselves or missed this portion of the Cohen report:

"Further, the survey found that 93 percent of consumers are very or somewhat satisfied overall with their wireless service, and that only 8 percent are not satisfied with their cell phone carrier's customer service."

-- Cohen Report, Page 6

This FCC survey is solid in its methodology and execution; it is accurate and representative in its results; and it provides a solid base of data for making informed and reasonable policy decisions. It is not perfect, but no human endeavor ever is.

We understand that Verizon finds that some of the results of the survey contradict its views. Such is the value of scientific research, to challenge assumptions and to provide facts.

Respectfully Submitted,



G. Evans Witt
CEO
Princeton Survey Research Associates International
1211 Connecticut Ave. NW Suite 305
Washington, DC 20036
(202) 293-4710

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